



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

JUN 09 2008

Ms. Karen Magliano, Manager
Air Quality Data Branch
Planning and Technical Support Division
Air Resources Board
California Environmental Protection Agency
P.O. Box 2815
Sacramento, CA 95812


Dear Ms. Magliano:

Thank you for your submission of the "Annual Monitoring Network Plan for the Small Districts in California, Volume 1", dated June 2007. We recognize that producing this document and the associated public inspection process represented new requirements and we appreciate your effort to meet them.

We have reviewed the submitted document and have found that it does not fully meet the minimum requirements set forth under 40 CFR Part 58.10. The comments enclosed with this letter identify several areas in the Plan where additional information is requested in order to complete the document and fully satisfy the requirements of 40 CFR Part 58.10. Rather than attempt to resolve these data gaps in this document, we request that ARB address the enclosed comments in future network plans.

If you have any questions regarding this letter or the enclosed comments, please feel free to contact me at (415) 972-3261 or Catherine Brown at (415) 947-4137.

Sincerely,


Sean P. Hogan, Manager
Air Quality Analysis Office

Enclosure

cc: J. Cook
K. Stroud

Review of: "Annual Monitoring Network Report for Small Districts in California Volume 1", June 2007, California EPA, Air Resources Board

General Comments

The subject network plan submitted by ARB in fulfillment of 40 CFR Part 58.10 does not fully meet EPA's reporting requirements and the organization of the Plan is difficult to follow, particularly for a member of the public. Included with these comments is a copy of the template EPA provided to assist districts with preparing the annual plans. This template includes a list of the elements required by 40 CFR Part 58.10 and a suggested organization which we advise ARB follows in developing future network plans. Also, recognizing that ARB already produces a "California State and Local Air Monitoring Network Plan" which covers some of the elements required by 40 CFR Part 58.10, we suggest considering options to augment this document to fulfill EPA annual network plan requirements. Attempting to meet EPA's requirements through two separate submittals presents organizational issues which might be more easily addressed if the information was consolidated into one document.

For reference, listed below are examples of network plans that we found to fully meet the requirements of 40 CFR Part 58.10.

Annual Network Plan for the Bay Area Quality Management District
(http://www.baaqmd.gov/tec/aammet/network_plan.htm)

Annual Network Plan for San Diego Air Pollution Control District
(<http://www.sdapcd.org/index.html>)

Also, please note that a final hardcopy version of the annual network plan should be submitted, with a signed cover letter, to Sean Hogan, Manager of the Air Quality Analysis Office.

In meeting the requirements of 40 CFR Part 58.10, the network plan should provide a comprehensive picture of the ARB ambient air monitoring network and thereby give the general public an understanding of the scope of air monitoring in the State. This should include discussion of the federal monitoring programs and ARB involvement (i.e. IMPROVE, PAMS, NCORE, SLAMS).

Section 1- Purposes, Scope and Organization of Report

This section states there are fourteen local districts reporting separately on their jurisdictions. The document should more clearly explain the scope of ARB's jurisdiction throughout the State and how it interacts with these fourteen districts. For example, does ARB have statewide jurisdiction and a role in ensuring that these agencies develop and submit annual network plans?